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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

versus

JAMES VELISSARIS,

Defendant.

No. 1:22-cr-00105-DLC

Hon. Denise L. Cote

**APPLICATION TO FILE UNDER
SEAL EXHIBIT TO SENTENCING
MEMORANDUM CONTAINING
SENSITIVE INFORMATION**

The Defendant, James Velissaris (“Mr. Velissaris” or “Defendant”), by and through his undersigned counsel, respectfully files this application to file an exhibit to his Sentencing Memorandum under seal. This Court’s “Individual Rules of Practice for Sentencing Proceedings,” requires an application for redaction of any sensitive information beyond the eleven categories of documents and/or information¹ identified in the Southern District of New York’s ECF Privacy Policy be served and filed at the time the sentencing submission is served.

¹ Social security numbers, names of minor children, dates of birth, financial account numbers, home addresses, personal identifying number(s), medical records, treatment and diagnosis, employment history,

In accordance with this Court's rules, Mr. Velissaris respectfully submits an application to file Exhibit C (Additional Sensitive Personal Information) under seal. Mr. Velissaris requests he be permitted to file Exhibit C under seal because it contains highly sensitive personal information regarding his background and child, including intimate details and context on the abuse that Mr. Velissaris and/or other third parties suffered. Sealing this document will protect the sensitivity of the information and the identities of the third parties involved.

For these reasons, we respectfully request that the Court grant Mr. Velissaris' application to file Exhibit C to the Sentencing Memorandum under seal.

Dated: March 24, 2023

Respectfully submitted,

/s/ Michael A. Battle

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- and -

individual financial information, proprietary or trade secret information, and information regarding an individual's cooperation with the government.

/s/ David Slovic

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